



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

March 22, 2013

**JACKSON COUNTY  
OHIO PRECIOUS METALS  
DMWM/SEDO  
OHD081319980**

Mr. Alan Stockmeister  
Ohio Precious Metals  
16064 Beaver Pike  
Jackson, Ohio 45640

Dear Mr. Stockmeister:

Thank you for your February 20 and March 18, 2013 responses to my February 8, 2013 Notice of Violation letter. The documentation you submitted included photographs of properly labeled containers, inspection checklists of hazardous waste accumulation areas, information on hazardous waste tank systems that are no longer in use for hazardous waste accumulation, universal waste training materials, and documentation that the company is not speculatively accumulating recyclable materials per paragraph (C)(8) of OAC 3745-51-01.

My review of this documentation reveals that OPM has adequately demonstrated abatement of all of the remaining violations discovered during the December 4 and 5, 2012 inspection.

#### **GENERAL COMMENT**

OPM should note that because it has ceased using its generator tank system for less-than-ninety-day-storage of hazardous waste (tanks have now been "repurposed for the storage of virgin and recyclable products", according to OPM's February 20, 2013 letter), your company is now responsible for self-implementing a generator closure of the tank system in accordance with OAC Rule 3745-52-34; the closure performance standard of OAC Rule 3745-66-11; as well as applicable disposal or decontamination requirements of OAC Rule 3745-66-14. For more information on these requirements, please see section 1.10 of the Ohio EPA Closure Plan Review Guidance (CPRG) found at:

<http://epa.ohio.gov/portals/32/pdf/2008CPRG.pdf> .

While there is no requirement for you to submit a certification to Ohio EPA documenting that this generator closure requirement has been completed, we strongly recommend that you maintain in your files documentation that the generator closure rules have been met as described in the CPRG, as you may

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be asked to provide that information for review during a future hazardous waste compliance inspection. If you do not maintain this information in your files and cannot document that it was done, please note that you could be responsible for a more comprehensive and costly hazardous waste closure of the tank area when the company ultimately ceases operations at that location.

If you have any questions about these requirements or how to comply with them, please contact me by telephone at (740) 380-5293 or by e-mail at [donna.goodman@epa.state.oh.us](mailto:donna.goodman@epa.state.oh.us).

Sincerely,



Donna Goodman  
Inspector  
Division of Materials and Waste Management

DG/mr

**NOTICE:**

***Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.***